

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SHAWN DRUMGOLD,	)	C.A. NO. 04-11193NG
Plaintiff	)	
	)	
v	)	
	)	
TIMOTHY CALLAHAN, ET AL.	)	
Defendant(s)	)	
	)	

**Motion for Leave to File Memorandums in Excess of 20 Pages**

Now comes the Plaintiff in the above entitled matter moves this court to allow him to file a Memorandum in Opposition to Defendants Walsh and Murphy's Motion for Summary Judgment which is 31 pages long and a Memorandum in Opposition to Defendant City of Boston and Defendant Roache's Motion for Summary Judgment which is 30 pages long.

In support thereof the Plaintiff says;

1. Each of the Memorandums address two separate Defendants who filed overlapping Motions for Summary Judgment. The Walsh and Murphy Motions each had separate Memorandums of Law totaling well in excess of 20 pages. The City of Boston and Roache Memorandum raise separate groups of issues as to each Defendant.
  
2. All four of the Defendants have raised multiple issues on Summary Judgment. Because of the extensive Discovery in this case, over thirty depositions and because

of the number of issues presented by the Summary Judgment Motions, the Plaintiff requires in excess of 20 pages in order to fairly outline this Opposition.

Wherefore the Plaintiff moves this court to allow this Motion.

Respectfully submitted,

By His Attorneys,

/s/ Michael Reilly\_\_\_\_\_

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